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July 28, 2021


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The Initial Pretrial Conference scheduled for August 2, 2021 is adjourned to September 27, 2021 at 11:00 a.m. The parties shall submit a proposed case management plan by September 20, 2021.

VIA ECF ONLY

The Honorable John P. Cronan
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

SO ORDERED.
Date: July 28, 2021
New York, New York



JOHN P. CRONAN
United States District Judge

**Re: *Jacobs Project Mgmt. Co. v. The Travelers Indemn. Co.*, Case No. 1:21-cv-4101
Second Request to Adjourn Initial Pretrial Conference and Associated Deadlines**

Dear Judge Cronan:

Venable represents Plaintiff Jacobs Project Management Co. in the action referenced above. Defendant The Travelers Indemnity Company is represented by Joanne Engeldrum, Esq., Rivkin Radler LLP. Third-Party Defendant Harleysville Insurance Company has not yet been served or appeared in this action.

On June 18, 2021, I wrote to the Court to report that the parties have reached an agreement in principle to settle this lawsuit, and to request an adjournment of the Initial Conference and associated deadlines. *See* ECF No. 12. The Court granted the request and adjourned the Initial Conference to August 2, 2021. *See* ECF No. 13.

The process of negotiating the settlement agreement in this and the underlying liability action has proven more time-consuming than the parties originally estimated. For this reason, the parties respectfully request a further adjournment of the Initial Conference and all related deadlines. While the parties are optimistic that the process is nearly concluded, so as to avoid asking for seriatim monthly adjournments, the parties respectfully request that the Court adjourn the Initial Conference to late September. All parties join in this request.

We thank the Court for its time and attention to this matter.

Respectfully submitted,



Benjamin P. Argyle

cc: Michael J. O'Connor, Esq., Venable LLP (*pro hac vice* forthcoming)
Joanne Engeldrum, Esq., Rivkin Radler LLP, *Attorneys for Defendant*
Arthur McQuillan, Esq., Nationwide/Harleysville (via email only)